

1 A. Yes, I received it.

2 Q. And then at some point after that, were you aware that an
3 order was issued that is called a preliminary injunction that
4 put Leigha back into the college?

5 A. Yes, sir.

6 Q. Okay. And then are you aware that there is currently a
7 motion pending to lift that injunction to remove Leigha from
8 the college?

9 A. No, I am not aware.

10 Q. Okay. Well, let me see what else. Is there anything we
11 haven't talked about, about this case, that you have
12 information that you want to talk about?

13 A. No, but I want to share with you that when we received
14 the order to let her back in, that we had a full class of
15 students and did not know at that time how we were going to
16 accommodate what the judge ordered. And when I say that,
17 that's when Drs. Batten and Strong, at least minimally, chose
18 to have met with me and -- of course, this has been months
19 ago -- and the struggle with how could we make this happen
20 because, as you have heard today about having a cohort of
21 students, there's so many students. You know, it wasn't like
22 moving somebody in and out.

23 Dr. Strong found out that one of the 20 students in the
24 class was -- and this gets into educational degree business
25 here -- that student could be taking other classes and then

1 come back into cosmetology at a later date. And Dr. Strong,
2 in order to accommodate for Leigha, contacted that student,
3 asked the student if they would take some business courses for
4 the time being, and that student was agreeable to do that.
5 Thus giving a seat for Leigha to come back in and for us to
6 comply with the judge's order.

7 I was also involved in the discussions with the faculty
8 and Dr. Strong in how to accommodate for Leigha to be
9 successful in the program if there was difficulty in having
10 partners. And there are options in there because sometimes
11 there's going to be somebody out, just like Dr. Strong said.
12 I'm being repetitive. The question I asked was, How do
13 students accomplish -- what do they do when they go through
14 the nails and the hair or when they sit for the board? My
15 understanding is that they do this with mannequins. And I
16 said, so when they go for the board, it's not on a real
17 person. it's on a mannequin, and they said yes. And I said,
18 then if we have students that want to do the work to complete
19 the program successfully, then let's have some mannequins. Do
20 you have enough to support this? If you don't, I will move
21 any funding that you need to do so. That's the only thing
22 that I think that I hadn't explained to you.

23 Q. Okay. And I appreciate that, President Fore. Thank you
24 for that. So it's your understanding that if, for one reason
25 or another, a student can't -- doesn't have a partner, then

1 they can work on the assignments, you know, on their own,
2 complete the assignments -- as long as they, you know,
3 complete the assignments, you know, and pass the course, they
4 can proceed through the program; is that right?

5 A. Correct.

6 Q. All right.

7 A. So I just have to say that usually things like this are
8 not brought forward to me unless there are -- because of my
9 background in academics -- ways to, like, how do we fix this.
10 How do we go about resolving this issue. And we want Leigha
11 to be successful. So this was, like, if there's some
12 difficulty at all in the classes in partnering up, then my
13 question then was, What do they do when they get to the
14 boards? Well, they use mannequins. And I said, then, let's
15 let students have options to use mannequins.

16 Q. Yeah, I think -- granted that you're there, and it sounds
17 like you're involved, and that's great. President Fore, have
18 you ever had conversations with Leigha?

19 A. No, I have not. I have never had a conversation with
20 her, never.

21 Q. Okay.

22 A. I think I have been in her presence, but I don't know
23 her. I haven't had any conversation.

24 Q. Okay. And I assume that if there is a student at the
25 college and she's having issues with other students, I assume

1 that the -- and correct me if I'm wrong, but I assume that the
2 college would want to work with that student and help them,
3 you know, find a way to complete the program and go on and
4 have a happy and successful life; correct?

5 A. That is my expectation of all faculty.

6 Q. Okay. And that just reminded me of something. Do you --
7 there was a faculty member named Chelise Smith. Are you aware
8 of -- and it's my understanding that at some point for some
9 reason she was terminated. Do you know why she was
10 terminated?

11 A. I am made aware if there is an issue with any faculty
12 member or any staff member that there is a -- if it rises to
13 the concern of potentially any termination. Now, there is a
14 difference because if they are adjunct, then the cause --
15 depending on what the issue is, an adjunct is pretty much an
16 at-will person versus a full-time employee where you go
17 through a grievance process. My recollection on that
18 matter -- and it is not solid -- is that it was a performance
19 issue. And when I say "performance," I typically am inferring
20 that this is a classroom management issue. And I knew that
21 there was an issue because I am usually the person that is
22 talked with, discussed with, that we need to terminate an
23 individual or dismiss an individual -- to use a kinder word --
24 particularly if they are adjunct and they are acting either as
25 someone that is unbecoming as an employee, a professional